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June 18, 2018

**BY ECF**

Hon. Andrew L. Carter, Jr  
United States District Judge  
Southern District of New York  
500 Pearl St., Room 1950  
New York, NY 10007

**RE. *Dobbs, et al. v. Metropolitan Transit Authority, et al.*,  
17cv8199 (ALC)(KNF)**

Dear Judge Carter, Jr:

I am an attorney from the Law Office of James E. Bahamonde, PC and hereby submit this joint status letter.

On May 3, 2018, Plaintiffs and Defendants MTA and Transit Authority appeared at a pre-motion conference before Your Honor. At that time, parties said we would try to resolve the case and avert motion practice. However, parties have been unable to reach to a resolution.

Consequently, Defendants respectfully seek permission to file a motion to dismiss. As a result, parties propose the following briefing schedule:

Notice of Motion and supporting papers	August 10, 2018
Papers in Opposition	September 20, 2018
Reply, if any	October 1, 2018

Thank you for your time and consideration.

Law Office of  
James E. Bahamonde, PC

June 18, 2018

Respectfully yours,

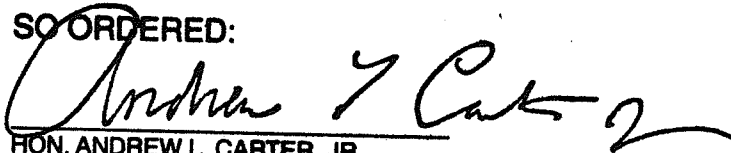
/s/ James E. Bahamonde

James E. Bahamonde, Esq.

cc: (by ECF)  
K. Bhatt  
Executive Agency Counsel  
New York City Transit Authority  
130 Livingston Street, 12th Floor  
Brooklyn, NY 11201

Alan M. Sclar  
Sclar Law Group, LLC  
120 West 45th St., Suite 605  
New York, NY 10036

SO ORDERED:

A handwritten signature in black ink, appearing to read "Andrew L. Carter, Jr.", written over a horizontal line.

HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

6-19-18